

FILED

UNITED STATES DISTRICT COURT
for the

OCT 11 2021

Southern District of Texas

Nathan Ochsner, Clerk

United States of America)
v.)
Jonathan Guemez (Y.O.B. 1992)) Case No. M-21-2132-M
Citizenship: USA)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 10, 2021 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C § 952
21 U.S.C § 841

Knowingly and intentionally import into the United States from the United Mexican States approximately 3.94 kilograms of heroin, a Schedule I controlled substance, and did knowingly and intentionally possess with the intent to distribute approximately 3.94 kilograms of heroin, a Schedule I controlled substance.

This criminal complaint is based on these facts:

See "Attachment A"

Continued on the attached sheet.

Sworn to and executed by reliable electronic means, sworn to
Printed name and title and attested telephonically per
FED.R.CR.4.1, and probable
cause found on: _____

Approved 10/11/21 by
AUSA Eliza Carmen Rodriguez
Sworn to before me and signed in my presence.

/s/ Mathew J Orzechowski

Complainant's signature

Mathew J Orzechowski HSI Special Agent

Printed name and title

Date: October 11, 2021 5:51 PM

Adalia Medrano, U.S. Magistrate Judge

Printed name and title

City and state: McAllen, TX

Nadia Medrano, U.S. Magistrate Judge

Attachment A

On October 10, 2021, Jonathan GUEMEZ, driving a 2014 Jeep Grand Cherokee, arrived at the Customs and Border Protection (CBP) Port of Entry (POE), in Hidalgo, Texas. GUEMEZ was travelling from Mexico and was seeking entry into the United States. Based on an active targeting record, GUEMEZ was referred to secondary inspection whereupon Homeland Security Investigations (HSI) Special Agents (SAs) and CBPOs discovered a concealed compartment in the vehicle. A total of three packages were extracted from the compartment. CBPOs extracted a substance from one of the bricks which field-tested positive for the properties of heroin. The three bricks had a combined total weight of 3.94 kilograms.

Vehicle registration records indicated the 2014 Jeep Cherokee was registered to GUEMEZ at the time of encounter, and GUEMEZ was the sole owner and operator of the vehicle.

HSI SAs, with the assistance of a CBP Task Force Officer (TFO) conducted a post-Miranda custodial interview of GUEMEZ. During the interview, GUEMEZ made multiple false statements and presented incorrect facts already known to investigators. When confronted, GUEMEZ admitted to lying, and changed his story multiple times.

GUEMEZ denied knowledge of transporting narcotics but stated he has knowingly transported a total of approximately \$250,000 in United States currency, over ten occasions; money which GUEMEZ admitted had ties to a drug trafficking organization. GUEMEZ also admitted to transporting the currency in the glove compartment of the vehicle.

GUEMEZ admitted each time he was tasked with picking up currency, unknown individuals took his vehicle from him for various amounts of time. GUEMEZ was unable to explain the need for the organization to take the vehicle for various lengths of time, based on the fact that the money was not concealed deeply within hidden compartments. The amount of time the vehicle was taken from him is consistent with the amount of time necessary to access the narcotics found within the hidden compartment.